



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

**1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733**

DEC 11 2005

Mr. Jon Craig, Director
Water Quality Protection Division
Oklahoma Department of Environmental Quality
P.O. Box 1677
Oklahoma City, OK 73101-1677

Dear Mr. Craig:

EPA Region 6 received the Oklahoma Department of Environmental Quality (ODEQ) Stage 2 Disinfectants and Disinfection Byproducts Rule (Stage 2 DBPR) and Long Term 2 Enhanced Surface Water Treatment Rule (LT2 ESWTR) proposed workload agreement on November 14, 2006. According to the agreement, ODEQ will assist EPA Region 6 in early implementation activities by committing to the following activities on a limited basis: ODEQ will review EPA's proposed lists of consecutive system connections and corresponding deadlines, review and comment on EPA Region 6's correspondence with water systems, assist in identifying systems that need to be contacted, will assist in EPA training workshops, will incorporate basic Stage 2 DBPR and LT2 ESWTR information in their current Stage 1 and LT1 trainings, and will provide operational assistance and advice to water systems that request assistance.

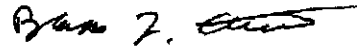
EPA Region 6 realizes the resource demands imposed by implementation of the Stage 1 DBPR, LT1 ESWTR, and other on-going drinking water rules has created challenges in ODEQ's ability to conduct early implementation activities for the Stage 2 DBPR and LT2 ESWTR and looks forward to the possibility of an expanded role for ODEQ in the future if resources and manpower become available. Until ODEQ expands its role in implementation of the Rules or obtains primacy for these Rules, EPA Region 6 continues to maintain primacy responsibility for both Rules and will continue performing the following activities related to implementation of the Stage 2 DBPR and LT2 ESWTR:

- Perform outreach and train systems on the Stage 2 DBPR and LT2 ESWTR requirements,
- Train systems on the Data Collection Tracking System database, which systems must use to show compliance with the Stage 2 DBPR and LT2 Rule,
- Modify and identify compliance schedules for systems,
- Approve monitoring data for systems attempting to qualify for the very small system waiver and 40/30 certification to meet the Initial Distribution System Evaluation requirement of the Stage 2 DBPR,
- Track compliance and utilization of the Data Collection Tracking System database and improve data quality in the DCTS,
- Revise monitoring plans and coordinate with system operators about any VSS waivers, 40/30 certifications, Standard Monitoring Plans, or System Specific Studies that are unapproved,
- Provide targeted assistance and training for purchase water systems. These systems often lack understanding of drinking water regulations,

- Coordinate and develop a strategy for early implementation activities,
- Provide ongoing technical assistance via phone or onsite reviews, and
- Make enforcement decisions and perform any necessary enforcement actions against non-compliant systems.

I appreciate ODEQ's assistance in early implementation activities. Should you have any questions, please contact me at (214) 665-7151 or your State Coordinator, Dawn Ison at (214) 665-2162.

Sincerely yours,



for Larry Wright
Chief
Source Water Protection Branch